STATE OF NEW HAMPSHIRE
Department of Environmental Services
Air Resources Division

Title V Operating Permit

Permit No: **TV-OP-046**
Date Issued: **February 28, 2003**

This certifies that:
Kalwall Corporation/Panels & Accessories Division
1111 Candia Road
PO Box 237
Manchester, NH 03105

has been granted a Title V Operating Permit for the following facility and location:
Kalwall Corporation/Panels & Accessories Division
1111 Candia Road
PO Box 237
Manchester, NH 03105
AFS Point Source Number – 3301100076

This Title V Operating Permit is hereby issued pursuant to RSA 125-C and Part Env-A 609. This permit has been prepared based on information specified in the Title V Operating Permit Application filed with the New Hampshire Department of Environmental Services on **June 28, 1996 and** supplemental information dated **July 10, 1998, June 7, 1999, and October 9, 2001** under the signature of the following responsible official certifying to the best of their knowledge that the statements and information therein are true, accurate and complete.

Responsible Official:
Paul H. Wenger
Operations Manager
(603) 627-3861
Technical Contact:
Robert E. Salois
Manager Corporate Environmental/Safety Affairs
(603) 225-5570

This Permit is issued by the New Hampshire Department of Environmental Services, Air Resources Division pursuant to its authority under New Hampshire RSA 125-C and in accordance with the provisions of Code of the Federal Regulations 40 Part 70.

This Title V Operating Permit shall expire on **February 28, 2008**

SEE ATTACHED SHEETS FOR ADDITIONAL PERMIT CONDITIONS

For the New Hampshire Department of Environmental Services, Air Resource Division

_____
Administrator, Stationary Source Management Bureau
Air Resources Division

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ABBREVIATIONS

AAL	Ambient Air Limit
AP-42	Compilation of EPA-approved Air Pollutant Emission Factors
ARD	Air Resources Division
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
BHP	Break Horse Power
BTU	British Thermal Units
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CAS	Chemical Abstract Service
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CNG	Compressed Natural Gas
CO	Carbon monoxide
CO_2	Carbon Dioxide
COMS	Continuous Opacity Monitoring System
DER	Discrete Emission Reduction
Env-A	New Hampshire Code of Administrative Rules – Air Resources Division
Env-Wm	New Hampshire Code of Administrative Rules – Waste Management Division
ECS	Emission Control System
ERC	Emission Reduction Credit
FR	Federal Register
HAP	Hazardous Air Pollutant
HCl	Hydrochloric acid
Hr	Hour
kGal	1,000 gallons
KW	Kilo Watt
LAER	Lowest Achievable Emission Rate
Lb/hr	Pounds per hour
LNB	Low NO_x Burner
LNG	Liquid Natural Gas
LPG	Liquid Petroleum Gas (Propane)
MACT	Maximum Achievable Control Technology
mg/L	Milligrams per liter (ppm)
MMBTU	Million British Thermal Units
MMCF	Million Cubic Feet
MW	Mega Watt
NAAQS	National Ambient Air Quality Standard
NESHAPs	National Emissions Standards for Hazardous Air Pollutants
NG	Natural Gas
NHDES (or DES)	New Hampshire Department of Environmental Services
NO_x	Oxides of Nitrogen
NSPS	New Source Performance Standard
NSR	New Source Review
PCB	Polychlorinated biphenyls
PE	Potential Emission

ABBREVIATIONS (cont.)

PM	Particulate Matter
PM_{10}	Particulate Matter less than 10 microns diameter
ppm	part per million
ppmv	part per million by volume
PSD	Prevention of Significant Deterioration
PSI	Pounds per Square Inch
PTE	Potential to Emit
RACT	Reasonably Available Control Technology
RTAP	Regulated Toxic Air Pollutant
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
T-12M	Tons during any consecutive 12-month period
TAP	Toxic Air Pollutant
TSP	Total Suspended Particulate Matter
TPY	Tons per Year
USEPA	United States Environmental Protection Agency
VOC	Volatile Organic Compound

Facility Specific Title V Operating Permit Conditions

I. Facility Description of Operations

Kalwall Corporation/Panels & Accessories Division (Kalwall) manufactures energy-conserving, light-transmitting building fenestration systems in Manchester, NH. Kalwall's manufacturing process consists of several work centers. Among these work centers are the I-Beam Sizers & Spreaders (IBSS), the Kalwall Weatherable Surface (KWS) panel coating line, and the Kalwall Corrosion Resistant Finish (KCRF) line. These three processes and ancillary operations are operated under permits issued by the New Hampshire Department of Environmental Services, Air Resources Division (DES). In the IBSS process, Kalwall's proprietary resin is applied to aluminum extrusions for bonding to a Fiberglass Reinforced Polyester (FRP) face sheet to form the sandwich panel. A surface coating is applied to the panels in the KWS process. The KCRF process is used to apply a finish to the aluminum extrusions that form the system for supporting the Kalwall panels in a building. Miscellaneous activities occurring during the manufacturing process comprise the ancillary components of the process.

II. Permitted Activities

In accordance with all of the applicable requirements and state-only enforceable requirements identified in this permit, the permittee is authorized to operate the devices and or processes identified in Sections III, IV, V and VI within the terms and conditions specified in this Permit.

III. Significant Activities Identification and Stack Criteria

A. Significant Activity Identification

The activities identified in the following table (Table 1) are subject to and regulated by this Title V Operating Permit:

Table 1 – Significant Activity Definition			
Emission Unit Number (EU#)	Description of Emission Unit	Exhaust Stack Identification	Emission Unit Maximum Allowable Permitted Capacity
EU1	IBSS Process (Lines #1 and #2, Offline IBSS)	IBSS Line #1 Front Oven IBSS Line #1 Back Oven IBSS Line #2 Front Oven IBSS Line #2 Back Oven	94.0 tons VOC emissions in any consecutive 12-month period on a facility wide basis. This will include emissions from the IBSS process, KWS process, KCRF process, and ancillary operations (KCRF cleaning, layup, layup pickup, use of solvent based cleaners for cleaning panels, and activating the bonding resin for fabrication of the panels) AND the IBSS process shall be limited to less than or equal to 25.0 tons VOC emissions in any consecutive 12-month period, subject to the emissions adjustment allowed pursuant to Table 4, Item 6.
EU2	KWS Process	KWS Spray Booth KWS Flash Zone KWS Dryer Oven KWS Oven Hood	94.0 tons VOC emissions in any consecutive 12-month period on a facility wide basis. This will include emissions from the IBSS process, KWS process, KCRF process, and ancillary operations. The KWS process shall be limited to less than or equal to 25.0 tons VOC emissions in any consecutive 12-month period, subject to the emissions adjustment allowed pursuant to Table 4, Item 6.
EU3	KCRF Process – Spray Booths #1, #2, #3, and drying oven	KCRF Spray Booth #1 KCRF Spray Booth #2 KCRF Spray Booth #3 KCRF Drying Oven	94.0 tons VOC emissions in any consecutive 12-month period on a facility wide basis. This will include emissions from the IBSS process, KWS process, KCRF process, and ancillary operations. The KCRF process shall be limited to less than or equal to 24.0 tons VOC emissions in any consecutive 12-month period, subject to the emissions adjustment allowed pursuant to Table 4, Item 6.

EU4	Ancillary Operations (KCRF cleaning, layup, layup pickup, use of solvent based cleaners for cleaning panels, and activating the bonding resin for fabrication of the panels)	None	94.0 tons VOC emissions in any consecutive 12-month period on a facility wide basis. This will include emissions from the IBSS process, KWS process, KCRF process, and ancillary operations. The Ancillary operations shall be limited to less than or equal to 20.0 tons VOC emissions in any consecutive 12-month period, subject to the emissions adjustment allowed pursuant to Table 4, Item 6.

B. Stack Criteria

The following stacks emit regulated toxic air pollutants subject to the state-only enforceable requirements[1] set forth in Env-A 1400. In accordance with RSA 125-C:11, I-a. and Env-A 609.04(a), Kalwall shall comply with the stack parameters contained in Table 2. Stack parameters may be changed by the facility provided the facility: (i) determines in advance of such change in accordance with the requirements of Env-A 1406, Methods of Demonstrating Compliance, that it shall remain in compliance with applicable ambient air limits established under Env-A 1400; (ii) maintains on site a written record of such determination; and (iii) provides DES with written notice of such change not later than ten days following completion of such change.

[1] The term "state-only enforceable requirement" is used to refer to those requirements that are not federally enforceable but are state requirements as defined in Env-A 101.263.

Table 2 - Stack Criteria			
Stack #	**Minimum Stack Height (Feet Above Ground Level)**	**Maximum Exit Stack Diameter (Feet)**	**Minimum Exhaust Flow (ACFM)**
IBSS Line #1 Front Oven	44.5 Vertical	2.0	4750
IBSS Line #1 Back Oven	44.5 Vertical	2.0	5570
IBSS Line #2 Front Oven	44.5 Vertical	2.0	1830
IBSS Line #2 Back Oven	44.5 Vertical	2.0	1960
KWS Spray Booth	43.3 Vertical	2.0	8650
KWS Flash Zone	24.0 Vertical & Capped	2.3 X 2.3 ft	1500
KWS Dryer Oven	23.5 Vertical & Capped	2.6 X 2.6 ft	2010
KWS Oven Hood	24.0 Vertical & Capped	1.3	866
KCRF Spray Booth #1	26.5 Vertical	3.5	23400
KCRF Spray Booth #2	26.25 Vertical	3.5	21930
KCRF Spray Booth #3	25.5 Vertical	2.0	8240
KCRF Oven	26.2 Vertical	1.3 X 1.3 ft	1290

IV. Insignificant Activities Identification

All activities at this facility that meet the criteria identified in the New Hampshire Rules Governing the Control of Air Pollution Part Env-A 609.03(g), shall be considered insignificant activities. Emissions from the insignificant activities shall be included in the total facility emissions for the emission-based fee calculation described in Section XXIII. of this Permit. Please see Appendix A for a list of insignificant activities at this facility.

V. Exempt Activities Identification

All activities identified in the New Hampshire Rules Governing the Control of Air Pollution Env-A 609.03(c) shall be considered exempt activities and shall not be subject to or regulated by this Title V Operating Permit.

VI. Pollution Control Equipment Identification

The KWS Spray Booth exhaust is equipped with particulate filter collectors. The KCRF Spray Booths #1, #2, & #3 are equipped with honeycomb paper filter media for particulate matter control.

VII. Alternative Operating Scenarios

The following alternative operating scenarios were identified for this Permit.

A. KWS Process Equipment - Kalwall may use an infrared heater as part of the curing process for its KWS process to enhance the curing of the KWS coatings.

B. KWS Coating Formulation – In order to accommodate weather conditions, such as higher temperatures and humidity during summer months, Kalwall is permitted to make the following coating formulation changes: (1) Kalwall may substitute Methyl Propasol Acetate (MPA) (CAS# 108-65-6) for n-Butyl Acetate (CAS# 123-86-4) in KWS coatings; and (2) Kalwall may modify the Urethane Reducer ratio for the KWS coating via changes in the amount of acetone (an exempt VOC compound) added to the KWS coating.

VIII. Applicable Requirements

A. State-only Enforceable Operational and Emissions Limitations:

The Permittee shall be subject to the state-only operational and emission limitations identified in Table 3 below:

Table 3 – State-Only Enforceable Operational and Emission Limitations

Item #	Regulatory Cite	Applicable Emission Unit	Applicable Requirement
1.	Env-A 1403.01	Facility wide	New or modified devices or processes installed after May 8, 1998 shall be subject to the requirements of Env-A 1400 (Regulated Toxic Air Pollutants).
2.	Env-A 1403.02(b)	Facility wide	All existing devices or processes in operation after the transition period ending on May 8, 2001 shall comply with Env-A 1400 (Regulated Toxic Air Pollutants).
3.	Env-A 1404.01(d)	Facility wide	Documentation for the demonstration of compliance shall be retained at the site, and shall be made available to the department for inspection.
4.	Env-A 1406.01	Facility wide	The owner of any device or process, which emits a regulated toxic air pollutant, shall determine compliance with the ambient air limits by using one of the methods provided in Env-A 1406.02, Env-A 1406.03, or Env-A 1406.04. Upon request, the owner of any device or process that emits a regulated toxic air pollutant shall provide documentation of compliance with the ambient air limits to the DES. Anytime Kalwall intends to use a new chemical product or coating in its manufacturing processes, it shall determine prior to any use, whether such use would be in compliance with Env-A 1400 and VOC RACT Requirements contained in this Permit, and determine whether a permit modification pursuant to Env-A 612 is required.

B. Federally Enforceable Operational and Emission Limitations

The Permittee shall be subject to the federally enforceable operational and emission limitations identified in Table 4 below:

Table 4 – Federally Enforceable Operational and Emission Limitations[2]			
Item #	Regulatory Cite	Applicable Emission Unit	Applicable Requirement and Description
1.	Temporary Permit FP-T-0056	EU1	The I-Beam Sizer and Spreader (IBSS) Lines #1 and #2 and Offline IBSS shall be allowed to operate 24 hours per day and 365 days per year, subject to a maximum volatile organic compounds (VOC) emissions cap of less than or equal to 25.0 tons VOC emissions in any consecutive 12-month period, established for compliance with regulations contained in the New Hampshire Code of Administrative Rules Chapter Env-A 1400, Regulated Toxic Air Pollutants and for purposes of netting out of New Source Review and Prevention of Significant Deterioration programs. In addition, IBSS Lines #1 and #2 are subject to federally enforceable VOC RACT Requirements contained in Section VIII.C.
2.	Temporary Permit FP-T-0056	EU2	The Kalwall Weatherable Surface Coating Process (KWS) process composed of the Spray Booth, Flash Zone, Dryer Oven, and Oven Hood shall be allowed to operate 24 hours per day and 365 days per year, subject to a maximum VOC emissions cap of less than or equal to 25.0 tons VOC emissions in any consecutive 12-month period, established for compliance with regulations contained in the New Hampshire Code of Administrative Rules Chapter Env-A 1400, Regulated Toxic Air Pollutants and for purposes of netting out of New Source Review and Prevention of Significant Deterioration programs. In addition, the KWS process is subject to federally enforceable VOC RACT Requirements contained in Section VIII.C.
3.	Temporary Permit FP-T-0056	EU3	The Kalwall Corrosion Resistant Finish (KCRF) process, composed of KCRF Spray Booths #1, #2, #3, and a drying oven, shall be allowed to operate 24 hours per day and 365 days per year, subject to a maximum VOC emissions cap of less than or equal to 24.0 tons VOC emissions in any consecutive 12-month period, established for compliance with regulations contained in the New Hampshire Code of Administrative Rules Chapter Env-A 1400, Regulated Toxic Air Pollutants and for purposes of netting out of New Source Review and Prevention of Significant Deterioration programs. In addition, the KCRF process is subject to VOC RACT Requirements contained in Section VIII.C.

2 Kalwall was previously permitted for individual process limits of: 30 tons VOC emissions per year for the KCRF process, 10 tons VOC emissions per year for IBSS Line #1; 10 tons VOC emissions per year for IBSS Line #2; 15 tons VOC emissions per year for the KWS process; and a facility wide total of 100 tons VOC emissions per year. VOC emissions from ancillary operations were not accounted for in previous permits. Furthermore, individual permits for the various processes had differing limits on hours of operation per day and days of operation per calendar year, which Kalwall desired to change to 24 hours per day and 365 days per year. Baseline average actual VOC emissions from 1998 and 1999 were: KCRF = 19.95 tons; KWS = 21.83 (but use lower of permitted maximum or actual = 15.0 tons permitted maximum); IBSS = 18.32 tons; and Ancillary = 16.19 tons. Hence, using a <25 ton increase in VOC emissions to keep below PSD and NSR applicability thresholds, the new facility wide total VOC emissions cap is as follows:
19.95 + 15.0 + 18.32 + 16.19 + 24.54 = 94.0 tons VOC emissions. For purposes of operational flexibility, and in accordance with the requirements set forth in Table 4, Item 6., the individual processes at the facility described in Table 1 may emit up to 20% above the limits established in Table 4, Items 1. through 4., provided there is a corresponding offset in allowable VOC emissions from one or more of the other processes such that the facility-wide VOC emissions do not exceed 94 tons in any consecutive 12-month period.

Table 4 – Federally Enforceable Operational and Emission Limitations[2]			
Item #	Regulatory Cite	Applicable Emission Unit	Applicable Requirement and Description
4.	Temporary Permit FP-T-0056	EU4	Ancillary operations shall be allowed to operate 24 hours per day and 365 days per year, subject to a maximum VOC emissions cap of less than or equal to 20.0 tons VOC emissions in any consecutive 12-month period, for purposes of netting out of New Source Review and Prevention of Significant Deterioration programs..
5.	Temporary Permit FP-T-0056	Facility wide	Kalwall shall not exceed 94.0 tons VOC emissions in any consecutive 12-month period on a facility wide basis. This will include emissions from the IBSS process, KWS process, KCRF process, and ancillary operations (KCRF cleaning, layup, layup pickup, use of solvent based cleaners for cleaning panels, and activating the bonding resin for fabrication of the panels).
6.	Temporary Permit FP-T-0056	EU1, EU2, EU3, & EU4	Individual process limits established in Conditions VIII.B.1., 2., 3., and 4. will be allowed up to a 20 percent deviation upwards, provided that there is a corresponding offset in allowable VOC emissions from one or more of the processes subject to Conditions VIII.B.1., 2., 3., or 4. above, such that Kalwall maintains the facility wide cap of 94.0 tons of VOC emissions as stated in Condition VIII.B.5. Any instances where emissions units in Conditions VIII.B.1., 2., 3., or 4. are 20 percent above the permitted limits in Conditions VIII.B.1., 2., 3., or 4. or where the facility-wide VOC emissions are above 94.0 tons constitutes a permit deviation and a permit violation.
7.	Temporary Permit FP-T-0056	EU2	The KWS process may be used for coating of metal panels provided the coatings meet the VOC RACT requirements specified in Env-A 1204.15(c)(1) or (3), i.e. topcoats shall be limited to a VOC emission rate of 4.3 lb VOC/gallon of coating, as applied, excluding water and exempt compounds, at all times, for clear or transparent topcoats as a protective, decorative or functional coating onto metal parts and products OR colored topcoats shall be limited to a VOC emission rate of 3.5 lb VOC/gallon of coating, as applied, excluding water and exempt compounds, at all times, for a coating that is used in extreme environmental conditions onto metal parts and products. Emissions from this activity shall be accounted for in the KCRF process emissions.
8.	Temporary Permit FP-T-0056	EU2 & EU3	The KWS process or KCRF process may be used for coating of insulation material ("colored inserts") provided the coatings meet the VOC RACT requirement for the KWS process, i.e., limit the VOC emission rate to 4.3 lb VOC/gallon of coating, as applied, excluding water and exempt compounds, at all times. Emissions from this activity shall be accounted for in the KWS process emissions.
9.	40 CFR 52[3]	Facility wide	The sulfur content of liquefied petroleum gas (LPG) shall not exceed 5 grains of sulfur per 100 cubic feet of gas, calculated as hydrogen sulfide at standard temperature and pressure.
10.	CAAA 112(r)(1)	Facility wide	The facility is subject to the Purpose and General Duty clause of the 1990 Clean Air Act, Section 112(r)(1), which states: "Identify hazards which may result from such releases using appropriate hazard assessment techniques; to design and maintain a safe facility taking such steps as are necessary to prevent releases; and to minimize the consequences of accidental releases which do occur."

[3] Env-A 402.03, effective on December 27, 1990, was adopted as part of the State Implementation Plan (SIP) on September 14, 1992 and is still considered federally enforceable until such time as the SIP is amended and approved by the EPA.

C. VOC RACT Requirements (Federally Enforceable)

Kalwall was issued a new Final VOC RACT Order ARD-99-001 on June 25, 1999. The following requirements apply to the facility:

1. **For the IBSS process** (Lines #1 and #2), Kalwall shall meet the following requirement as RACT:

   a) Limit the VOC emission rate to 4.5 lb VOC/gallon of bonding agent, as applied, excluding water and exempt compounds, at all times.

2. **For the KWS process**, Kalwall shall meet the following requirement as RACT:

   a) Limit the VOC emission rate to 4.3 lb VOC/gallon of coating, as applied, excluding water and exempt compounds, at all times.

3. **For topcoats applied in the KCRF process**, comply with the provisions of Env-A 1204.15(c)(2) Emissions Standards for Coating of Miscellaneous Metal Parts and Products, which limits the VOC emission rate to 3.5 lb VOC/gallon of coating, as applied, excluding water and exempt compounds, at all times, for air dried coatings as a protective, decorative or functional coating onto metal parts and products.

4. **For clear or transparent topcoats applied in the KCRF process**, comply with the provisions of Env-A 1204.15(c)(1) Emissions Standards for Coating of Miscellaneous Metal Parts and Products, which limits the VOC emission rate to 4.3 lb VOC/gallon of coating, as applied, excluding water and exempt compounds, at all times, for clear or transparent topcoats as a protective, decorative or functional coating onto metal parts and products.

5. **For pretreat primer applied in the KCRF process**, comply with the provisions of Env-A 1204.15(c)(3) Emissions Standards for Coating of Miscellaneous Metal Parts and Products, which limits the VOC emission rate to 3.5 lb VOC/gallon of coating, as applied, excluding water and exempt compounds, at all times, for a coating that is used in extreme environmental conditions. If the facility is unable to meet this VOC RACT limit, it shall comply with the applicable requirements contained in Env-A 3100 Discrete Emissions Reductions Trading Program.

6. The use of Discrete Emission Reductions is allowed provided the facility is in compliance with all ambient air limits for regulated toxic air pollutants as certified in the Notice and Certification of Use of Discrete Emissions Reductions (DERs) filed annually with the New Hampshire Department of Environmental Services, Air Resources Division, under the signature of the responsible official certifying to the best of his/her knowledge that the statements and information therein are true, accurate, and complete.

7. Kalwall shall use Best Work-practice Standards in use of MEK[4] for wipe down of metal substrate and other ancillary operations. This requires use of bench cans for application of MEK to wipe down rags and the use of closed containers for the storage of contaminated wipe down rags that are not in use.

[4] MEK or alternative solvent or cleaning solvent blend.

8. Kalwall shall maintain records of the monthly usage and emissions of all VOCs from each operation individually and from combined operations. Such information will be used to determine compliance with all existing individual process permits and any future permits to be issued.

9. Prior to the use of any new coatings and primers at the facility, Kalwall must demonstrate compliance with Conditions VIII.C.1., 2., 3., 4., or 5., as applicable, by one of the following options:

   a) Prima facie evidence - Use of chemical manufacturers Material Safety Data Sheet (MSDS) information (density and weight percent VOC content) along with Kalwall coating formulation recipe information (gallons of each ingredient, i.e. resins, cure, diluent solvent, and exempt diluent solvent; density of each ingredient; and weight percent VOC content of each ingredient). Kalwall shall calculate the pounds VOC per gallon coating minus water and exempt compounds for the coating as applied via use of the following formula:

      $(P * X)/(1 - Yw - Ye)$

      Where:
      P = Density of the mixed coating as applied (pounds coating/gallon coating)
      X = Weight fraction of VOC in the mixed coating
      Yw = Volume fraction of water in the mixed coating
      Ye = Volume fraction of exempt compounds in the mixed coating

      When using prima facie evidence as obtained in the above fashion, Kalwall shall maintain the calculation sheets and records for each coating formulation. All Method 24 analyses and prima facie evidence calculation sheets for new coatings shall be kept on file at the facility, for review by DES or EPA personnel, upon request. Kalwall shall submit a summary of Method 24 analyses and prima facie evidence with the annual VOC report[5]; **OR**

   b) For sources subject to Env-A 1204, when formal compliance is demonstrated for the low VOC coatings, the referee liquid VOC test method for ultimate determination of compliance with VOC RACT shall be the EPA reference methods specified as follows:

      - Method 24, 40 CFR Part 60, Appendix A for all coatings as applicable using the 60-minute bake time procedure; or
      - Method 24A, 40 CFR Part 60, Appendix A as applicable.

   c) The DES reserves the right, to have Kalwall perform Method 24 testing on any coatings for formal demonstration of compliance.

10. Kalwall shall submit an annual report, no later than April 15th of each year, detailing all efforts to reduce VOC emissions facility-wide during the preceding calendar year, including,

[5] This summary shall include the coating name, facility assigned product or coating number, coating type (e.g., clear or colored topcoat, primer), date of testing or prima facie calculation, and results of testing or calculation expressed in terms of pounds of VOC per gallon of coating, as applied, minus water and exempt compounds.

if applicable, any examinations or evaluations undertaken of alternative adhesives or coatings for use as a low-VOC replacement for the IBSS adhesive or the KCRF pretreat primer, respectively.

D. Emissions Reductions Trading Requirements

This Title V Operating Permit allows the use of Discrete Emissions Reductions (DERs). Kalwall has opted for use of DERs with respect to the wash primer used in the KCRF processes. Use of DERs by Kalwall shall be in accordance with Env-A 3100.

E. Monitoring and Testing Requirements

The Permittee is subject to the monitoring/testing requirements as contained in Table 5 below:

Table 5 – Monitoring/Testing Requirements

Item #	Emission Unit	Parameter	Method of Compliance	Frequency of Method	Regulatory Cite
1.	EU1, EU2, & EU3	Allows for adequate dispersion of HAPs and other regulated pollutants	Conduct an annual inspection of each stack. Inspections shall include documenting any leaks, holes, rusting, and/or structural disrepair of stacks. Records of inspections and subsequent maintenance performed as a result of the annual inspections shall be kept on file at the facility, for review by the DES and/or EPA upon request.	Annually	40 CFR 70.6(a)(3) Federally Enforceable
2.	EU3	Particulate Matter Control	Conduct a monthly inspection of the fabric filters in KCRF Spray Booths 1, 2, and 3. Maintain and replace in accordance with manufacturer's specifications and/or standard operating procedures. Keep records of maintenance and corrective actions in a permanently bound notebook.	Monthly	40 CFR 70.6(a)(3)(B) Federally Enforceable
3.	Facility Wide	VOC RACT Compliance	Kalwall shall follow procedures in Condition VIII.C.9. for new coatings used at the facility.	As needed	40 CFR 70.6(a)(3)(B) Federally Enforceable

F. Recordkeeping Requirements

The Permittee is subject to the Recordkeeping requirements as contained in Table 6 below:

Table 6 - Applicable Recordkeeping Requirements

Item #	Recordkeeping Requirement	Frequency of Recordkeeping	Applicable Emission Unit	Regulatory Cite
1.	Monthly and annual records of fuel utilization shall be kept at the facility for all combustion devices and contain the following information: (A) For applicable liquid fuels, pursuant to Env-A 1603.01: 1. Consumption; 2. Fuel type; and 3. Sulfur content as percent sulfur by weight of fuel; (B) For applicable gaseous fuels, pursuant to Env-A 1603.02: 1. Consumption; 2. Fuel type; and 3. Sulfur content as percent sulfur by weight or fuel in grains per 100 cubic feet of fuel.	Monthly & Annually	All combustion devices	Env-A 903.03(a) Temporary Permit FP-T-0056 Federally Enforceable
2.	<u>General VOC Recordkeeping Requirement</u> Kalwall shall record and maintain the following information at the facility: (A) Identification of each VOC-emitting process or device, except: 1. Processes or devices associated exclusively with non-core activities, as defined in Env-A 1204.03(ba); and 2. Processes or devices emitting only exempt VOCs as defined in Env-A 1204.03(z); (B) The operating schedule during the high ozone season for each VOC-emitting process or device identified in (A), above, including: 1. Hours of operation per calendar month; and 2. Days of operation per calendar month; (C) The following VOC emission data: 1. Actual VOC emissions from each VOC-emitting process or device identified in (A), above, for: a. Each calendar year in tons; and b. A high ozone season day during that calendar year, in pounds per day; and 2. The emission factors and the origin of the emission factors used to calculate the VOC emissions. (D) Maintain records of Method 24 analyses or prima facie evidence for new coatings for purposes of demonstrating compliance with VOC RACT Requirements in Section VIII.C.	Monthly and annually	Facility Wide	Env-A 904.02 Temporary Permit FP-T-0056 Federally Enforceable

Table 6 - Applicable Recordkeeping Requirements				
3.	<u>VOC Recordkeeping for Surface Coating and Printing Operations</u> For all surface coating and printing operations, in addition to the requirements set forth in Env-A 904.02, the following information shall be recorded and maintained: (A) Coating or ink formulation and analytical data, as follows: (1) Supplier; (2) Name and color; (3) Type; (4) Identification number; (5) Density described as lbs/gal; (6) Total volatiles content described as weight percent; (7) Water content described as weight percent; (8) Exempt solvent content described as weight percent; (9) VOC content described as weight percent; (10) Solids content described as volume percent; (11) Diluent name and identification number; (12) Diluent solvent density described as lbs/gal; (13) Diluent VOC content described as weight percent; (14) Diluent exempt solvent content described as weight percent; (15) Volume of diluent VOC described as gal; and (16) Diluent/solvent ratio described as gal diluent solvent/gal coating. (B) The number of gallons of each coating and ink, including solvents and diluents, utilized during a typical high ozone season day for each surface coating or printing operation; (C) Process information for each surface coating or printing operation identified in Env-A 904.02(a), for a typical high ozone season day including: (1) Method of application; (2) Number of coats for coating operations; (3) Drying method, if applicable; and (4) Substrate type and form; and	Maintain at facility at all times.	Facility Wide	Env-A 904.03 Temporary Permit FP-T-0056 Federally Enforceable
4.	<u>Format for Recording (VOC Recordkeeping) Information</u> (A) For surface coating operations and rotogravure, flexographic, and offset lithographic printing, the information required pursuant to Env-A 904.03(a)-(c) above, shall be recorded on standard forms included in the Record keeping Guidance Document for Surface Coating Operations and the Graphic Arts Industry, EPA, July 1988; or (B) If a facility chooses to use alternate forms, these forms shall contain the same data and information required pursuant to Env-A 904.03(a)-(c).	As stated in Env-A 904.03	Facility Wide	Env-A 904.04 Temporary Permit FP-T-0056 Federally Enforceable

Table 6 - Applicable Recordkeeping Requirements				
5.	The Permittee shall maintain all required records and support information for a period of at least 5 years from the date of the origination.	Retain for a minimum of 5 years	Facility Wide	40 CFR 70.6(a)(3)(ii)(B) Federally Enforceable

G. Reporting Requirements

The Permittee is subject to the reporting requirements as contained in Table 7 below:

Table 7 - Applicable Reporting Requirements

Item #	Reporting Requirement	Frequency of Reporting	Applic-able Emission Unit	Regulatory Cite
1.	VOC Reporting Requirements (A) Kalwall shall submit the following information to the Director in accordance with the schedule set forth in Env-A 908.02(a): (1) Facility information including: a. Source name; b. Standard Industrial Classification (SIC) code; c. Physical address; and d. Mailing address; (2) Identification of each VOC-emitting process[6] or device operating at the source identified in (1) above; (3) Operating schedule during the high ozone season for each VOC-emitting process or device identified in (2), above, including; a. Hours of operation per calendar day; and b. Days of operation per calendar week; and (4) Total quantities of actual VOC emissions for the entire facility and for each process or device identified in (2), above, including: a. Annual VOC emissions, in tons; and b. Typical high ozone season day VOC emissions, in pounds per day. (B) Coating operations subject to this part shall submit to the Director, for each coating line, the information required pursuant to Env-A 904.03. (C) All sources not classified in accordance with Env-A 908.03(b) through (e), shall submit to the Director the information required pursuant to Env-A 904.02. (D) Kalwall shall identify its current permit limits as stipulated in Conditions VIII.B.1. through 5. and show its reported actual VOC emissions by process and facility wide, identifying any deviations plus or minus from these limits. If a deviation occurs, i.e., a process consecutive 12-month actual VOC emissions tons per year limit is exceeded, Kalwall shall follow the permit deviation record keeping and reporting requirements as identified in Condition XXVIII. of this Permit. If a deviation occurs where a process consecutive 12-month actual VOC emissions ton per year limit is exceeded by greater than or equal to 20 percent or the facility wide consecutive 12-month actual VOC emissions 94 ton per year limit is exceeded, it shall be considered a violation of this Permit.	Annually, before April 15th of the following year.	Facility Wide	Env-A 908.02(a) & Env-A 908.03 Temporary Permit FP-T-0056 Federally Enforceable

[6] For clarification purposes, EU1, EU2, EU3, and EU4 are the VOC-emitting processes at the facility.

Table 7 - Applicable Reporting Requirements				
2.	General Reporting Requirements The owner or operator of any stationary source, area source or device subject to Env-A 600 shall submit an annual emissions report. The annual emissions report shall include the following information: (A) The actual emissions of the stationary source, area source or device and the methods used in calculating such emissions in accordance with Env-A 704.02; (B) For Process operations, all information in accordance with Env-A 903.02; (C) For combustion devices, all information in accordance with Env-A 903.03; and (D) The actual annual emissions speciated by individual regulated air pollutants, including a breakdown of VOC emissions by compound.	Annually, before April 15th of the following year	Facility Wide	Env-A 907.01 Temporary Permit FP-T-0056 Federally Enforceable
3.	Prompt reporting of deviations from Permit requirements within 24 hours of such an occurrence by phone, e-mail, or fax in accordance with Section XXVIII. of this Permit.	Prompt reporting (i.e., within 24 hours of an occurrence) to DES	Facility Wide	40 CFR 70.6(a)(3)(iii)(B) Federally Enforceable
4.	The Permittee shall submit to the DES a summary report of monitoring/testing requirements and permit deviations every 6 months. All instances of deviations from Permit requirements must clearly be identified in such reports. All reports must be certified by a responsible official, consistent with section 40 CFR 70.5(d). The report shall contain a summary of the following information: (A) Preventative maintenance and inspection results for stacks; (B) Preventative maintenance and inspection results for the fabric filters in KCRF Spray Booths 1, 2, and 3; and (C) Any permit deviation subject to Condition XXVIII.	Every 6 months, by January 31st and July 31st of each calendar year to DES and EPA	Facility Wide	40 CFR 70.6(a)(3)(iii)(A) Federally Enforceable
5.	Kalwall shall submit an annual report, no later than April 15th of each year, detailing all efforts to reduce VOC emissions facility-wide during the preceding calendar year, including, if applicable, any examinations or evaluations undertaken of alternative adhesives or coatings for use as a low-VOC replacement for the IBSS adhesive or the KCRF pretreat primer, respectively. In addition, Kalwall shall submit a summary report of Method 24 analyses conducted for the calendar year and prima facie evidence in support of compliance with VOC RACT Requirements in Section VIII.C.	Annually, by April 15th	Facility Wide	VOC RACT Order ARD-99-001 Federally Enforceable
6.	Any report submitted to the DES and/or EPA shall include the certification of accuracy statement as outlined in Section XXI.B. in this Permit and shall be signed by the responsible official.	As specified	Facility Wide	40 CFR 70.6(c)(1) Federally Enforceable
7.	Annual reporting and payment of emission-based fees shall be conducted in accordance with Condition XXIII. in this Permit.	As specified in Condition XXIII. to DES	Facility Wide	Env-A 704.03 Federally Enforceable
8.	Annual compliance certification shall be submitted in accordance with Condition XXI. in this Permit.	April 15th to DES and EPA	Facility Wide	40 CFR 70.6(c)(1) Federally Enforceable

IX. Requirements Currently Not Applicable

The Permittee has identified the following requirements, which are not applicable to the facility.

Table 8 – List of Requirements Currently Not Applicable	
Statutes and Regulations	Description
CAA Section 111.42 U.S.C. 7411	Requirements establishing new source performance standards
CAA Section 112(g), 42 U.S.C. 7412	Requirements to establish case-by-case MACT standard for construction of new sources and modifications to existing sources
CAA Section 112(j), 42 U.S.C. 7412	Requirement to establish a case-by-case MACT standard when EPA is late in promulgating a MACT standard for a particular source category
CAA Section 123, 42 U.S.C. 7423	Requirement establishing stack height standards and restrictions
CAA Subchapter VI, 42 U.S.C. 7671 a-p, and 40 CFR 82	Requirements related to stratospheric ozone protection
40 CFR 61	NESHAP
40 CFR 63[7]	NESHAP's for source categories
Env-A 406	Record keeping and reporting requirements contained in the state acid deposition control program
Env-A 608	State Permit to Operate program requirements. Not applicable once a Title V Operating Permit is issued.
Env-A 610	Provisions governing general permits issued by DES
Env-A 611	Acid Rain permitting requirements for sources subject to Title IV of the CAA
Env-A 613	Additional permitting requirements for sources opting for use of the "bubble" concept
Env-A 702 and 703	Permit fee and permit review fees for non-Title V sources
Env-A 805	Continuous Emission Monitoring requirements
Env-A 810	Testing requirements for small boilers and emergency generators subject to NOx RACT requirements
Env-A 901.02	Record keeping requirements for sources operating continuous emission monitoring systems
Env-A 901.08	NOx record keeping requirements
Env-A 901.09	NOx reporting requirements
Env-A 1204.18 and 1204.19	VOC RACT requirements for printing operations
Env-A 1204.20 and 1204.21	VOC RACT requirements for fixed-roof tanks and external floating roof tanks of volatile organic liquids with a storage capacity greater than 40,000 gallons
Env-A 1204.26	VOC RACT requirements for Solvent Metal Cleaning with actual VOC emissions greater than 5 tons in any consecutive 12 month period
Env-A 1211	NOx RACT requirements
Env-A 2003.08	Particulate matter emission standards for fuel burning devices installed on or after January 1, 1985
Env-A 2104	Emission standards for toxic particulate matter from process, manufacturing, and service-based industries
Env-A 2105	Emission standards for toxic particulate matter (Beryllium, Mercury, and Asbestos) from process, manufacturing, and service-based industries
Env-A 2106	Emission standards for acid mists, including sulfur dioxide mists and nitrogen oxide mists from process, manufacturing, and service-based industries

[7] Kalwall may become subject to Surface Coating of Miscellaneous Metal Parts and Coating of Plastics MACT Standards after issuance of this Title V Operating Permit, depending on applicability criteria established by EPA.

General Title V Operating Permit Conditions

X. Issuance of a Title V Operating Permit

A. This Permit is issued in accordance with the provisions of Part Env-A 609. In accordance with 40 CFR 70.6(a)(2) this Permit shall expire on the date specified on the cover page of this Permit, which shall not be later than the date five (5) years after issuance of this Permit.

Permit expiration terminates the Permittee's right to operate the Permittee's emission units, control equipment or associated equipment covered by this permit, unless a timely and complete renewal application is submitted at least 6 months before the expiration date.

B. Pursuant to Env-A 609.02(b), this Permit shall be a state permit to operate as defined in RSA 125-C:11, III.

XI. Title V Operating Permit Renewal Procedures

Pursuant to Env-A 609.06(b), an application for renewal of this Permit shall be considered timely if it is submitted to the Director at least six months prior to the designated expiration date of this Permit.

XII. Application Shield

Pursuant to Env-A 609.07, if an applicant submits a timely and complete application for the issuance or renewal of a Permit, the failure to have a Permit shall not be considered a violation of this part until the Director takes final action on the application.

XIII. Permit Shield

A. Pursuant to Env-A 609.08(a), a permit shield shall provide that:

1. For any applicable requirement or any state requirement found in the New Hampshire Rules Governing the Control of Air Pollution specifically included in this Permit, compliance with the conditions of this Permit shall be deemed compliance with said applicable requirement or said state requirement as of the date of permit issuance; and

2. For any potential applicable requirement or any potential state requirement found in the New Hampshire Rules Governing the Control of Air Pollution specifically identified in this Title V Operating Permit Section IX as not applicable to the stationary source or area source, the Permittee need not comply with the specifically identified federal or state requirements.

B. The permit shield identified in Section XIII. of this Permit shall apply only to those conditions incorporated into this Permit in accordance with the provisions of Env-A 609.08(b). It shall not apply to certain conditions as specified in Env-A 609.08(c) that may be incorporated into this Permit following permit issuance by DES.

C. If a Title V Operating Permit and amendments there to issued by the DES does not expressly include or exclude an applicable requirement or a state requirement found in the NH Rules Governing the Control of Air Pollution, that applicable requirement or state requirement shall not be covered by the permit shield and the Permittee shall comply with the provisions of said requirement to the extent that it applies to the Permittee.

D. If the DES determines that this Title V Operating Permit was issued based upon inaccurate or incomplete information provided by the applicant or Permittee, any permit shield provisions in said Title V Operating Permit shall be void as to the portions of said Title V Operating Permit which are affected, directly or indirectly, by the inaccurate or incomplete information.

E. Pursuant to Env-A 609.08(f), nothing contained in Section XIII of this Permit shall alter or affect the ability of the DES to reopen this Permit for cause in accordance with Env-A 609.18 or to exercise its summary abatement authority.

F. Pursuant to Env-A 609.08(g), nothing contained in this section or in any title V operating permit issued by the DES shall alter or affect the following:

1. The ability of the DES to order abatement requiring immediate compliance with applicable requirements upon finding that there is an imminent and substantial endangerment to public health, welfare, or the environment;

2. The state of New Hampshire's ability to bring an enforcement action pursuant to RSA 125-C:15,II;

3. The provisions of section 303 of the Act regarding emergency orders including the authority of the EPA Administrator under that section;

4. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

5. The applicable requirements of the acid rain program, consistent with section 408(a) of the Act;

6. The ability of the DES or the EPA Administrator to obtain information about a stationary source, area source, or device from the owner or operator pursuant to section 114 of the Act; or

7. The ability of the DES or the EPA Administrator to enter, inspect, and/or monitor a stationary source, area source, or device.

XIV. Reopening for Cause

The Director shall reopen and revise a Title V Operating Permit for cause if any of the circumstances contained in Env-A 609.18(a) exist. In all proceedings to reopen and reissue a Title V Operating Permit, the Director shall follow the provisions specified in Env-A 609.18(b) through (g).

XV. Administrative Permit Amendments

A. Pursuant to Env-A 612.01, the Permittee may implement the changes addressed in the request for an administrative permit amendment as defined in Part Env-A 100 immediately upon submittal of the request.

B. Pursuant to Env-A 612.01, the Director shall take final action on a request for an administrative permit amendment in accordance with the provisions of Env-A 612.01(b) and (c).

XVI. Operational Flexibility

A. Pursuant to Env-A 612.02(a), the Permittee subject to and operating under this Title V Operating Permit may make changes involving trading of emissions under this existing Title V Operating Permit at the permitted stationary source or area source without filing a Title V Operating Permit application for and obtaining an amended Title V Operating Permit, provided that all the conditions are met as specified in section XVI.1. through 7. of this permit and a notice is submitted to the DES and EPA describing the intended changes.

1. The change is not a modification under any provision of title I of the Act;

2. The change does not cause emissions to exceed the emissions allowable under the title V operating permit, whether expressed therein as a rate of emissions or in terms of total emissions;

3. The owner or operator has obtained any temporary permit required by Env-A 600;

4. The owner or operator has provided written notification to the director and administrator at least 15 days prior to the proposed change and such written notification includes:

    a) The date on which each proposed change will occur;
    b) A description of each such change;
    c) Any change in emissions that will result and how this change in emissions will comply with the terms and conditions of the permit;
    d) A written request that the operational flexibility procedures be used; and
    e) The signature of the responsible official, consistent with Env-A 605.04(b);

5. The Title V Operating Permit issued to the stationary source or area source already contains terms and conditions including all terms and conditions which determine compliance required under 40 CFR 70.6(a) and (c) and which allow for the trading of emissions increases and decreases at the permitted stationary source or area source solely for the purpose of complying with a federally-enforceable emissions cap that is established in the permit independent of otherwise applicable requirements;

6. The owner or operator has included in the application for the Title V Operating Permit proposed replicable procedures and proposed permit terms which ensure that the emissions trades are quantifiable and federally enforceable for changes to the Title V Operating Permit which qualify under a federally- enforceable emissions cap that is established in the Title V Operating Permit independent of the otherwise applicable requirements; and

7. The proposed change complies with Env-A 612.02 (e).

B. Pursuant to Env-A 612.02(c), the Permittee subject to and operating under this Title V Operating Permit may make changes not addressed or prohibited by this existing Title V Operating Permit at the permitted stationary source or area source without filing a Title V Operating Permit application, provided that all the conditions specified in Env-A 612.02(c)(1) through (6) are met and a notice is submitted to the DES and EPA describing the intended changes.

C. Pursuant to Env-A 612.02(d), the Permittee, Operator, Director and Administrator shall attach each notice of an off-permit change completed in accordance with Section XVI of this Title V Operating Permit to their copy of the current Title V Operating Permit.

D. Pursuant to Env-A 612.02(e), any change under Section XVI shall not exceed any emissions limitations established under the NH Rules Governing the Control of Air Pollution, or result in an increase in emissions, or result in new emissions, of any toxic air pollutant or hazardous air pollutant other than those listed in the existing Permit.

E. Pursuant to Env-A 612.02(f), the off-permit change shall not qualify for the permit shield under Env-A 609.08.

XVII. Minor Permit Amendments

A. Pursuant to Env-A 612.04 prior to implementing a minor permit modification, the Permittee shall submit a written request to the Director in accordance with the requirements of Env-A 612.04(b).

B. The Director shall take final action on the minor permit amendment request in accordance with the provisions of Env-A 612.04(c) through (g).

C. Pursuant to Env-A 612.04(g), the permit shield specified in Env-A 609.08 shall not apply to minor permit amendments under Section XVII. of this Permit.

D. Pursuant to Env-A 612.04(I), the Permittee shall be subject to the provisions of Part Env-A 614 and Part Env-A 615 if the change is made prior to the filing with the Director a request for a minor permit amendment.

XVIII. Significant Permit Amendments

A. Pursuant to Env-A 612.05, a change at the facility shall qualify as a significant permit amendment if it meets the criteria specified in Env-A 612.05(a)(1) through (7).

B. Prior to implementing the significant permit amendment, the Permittee shall submit a written request to the Director which includes all the information as referenced in Env-A 612.05(b) and (c) and shall be issued an amended Title V Operating Permit from the DES. The Permittee shall be subject to the provisions of Env-A 614 and Env-A 615 if a request for a significant permit amendment is not filed with the Director and/or the change is made prior to the issuance of an amended Title V Operating Permit.

C. The Director shall take final action on the significant permit amendment in accordance with the Procedures specified in Env-A 612.05(d), (e) and (f).

XIX. Title V Operating Permit Suspension, Revocation or Nullification

A. Pursuant to RSA 125-C:13, the Director may suspend or revoke any final permit issued hereunder if, following a hearing, the Director determines that:

1. the Permittee has committed a violation of any applicable statute or state requirement found in the New Hampshire Rules Governing the Control of Air Pollution, order or permit condition in force and applicable to it; or

2. that the emissions from any device to which this Permit applies, alone or in conjunction with other sources of the same pollutants, presents an immediate danger to the public health.

B. The Director shall nullify any Permit, if following a hearing in accordance with RSA 541-A:30, II, a finding is made that the Permit was issued in whole or in part based upon any information proven to be intentionally false or misleading.

XX. Inspection and Entry

Pursuant to Env-A 614.01, EPA and DES personnel shall be granted access to the facility covered by this Permit, in accordance with RSA 125-C:6,VII for the purposes of: inspecting the proposed or permitted site; investigating a complaint; and assuring compliance with any applicable requirement or state requirement found in the NH Rules Governing the Control of Air Pollution and/or conditions of any Permit issued pursuant to Chapter Env-A 600.

XXI. Certifications

A. Compliance Certification Report

In accordance with 40 CFR 70.6(c) the Responsible Official shall certify, for the previous calendar year, that the facility is in compliance with the requirements of this permit. The report shall be submitted annually, no later than April 15th of the following year. The report shall be submitted to the DES and to the U.S. Environmental Protection Agency - New England Region**.** The report shall be submitted in compliance with the submission requirements below.

In accordance with 40 CFR 70.6(c)(5), the report shall describe:

1. The terms and conditions of the Permit that are the basis of the certification;

2. The current compliance status of the source with respect to the terms and conditions of this Permit, and whether compliance was continuous or intermittent during the reporting period;

3. The methods used for determining compliance, including a description of the monitoring, record keeping, and reporting requirements and test methods; and

4. Any additional information required by the DES to determine the compliance status of the source.

B. Certification of Accuracy Statement

All documents submitted to the DES shall contain a certification of accuracy statement by the responsible official of truth, accuracy, and completeness. Such certification shall be in accordance with the requirements of 40 CFR 70.5(d) and contain the following language:

> "I am authorized to make this submission on behalf of the facility for which the submission is made. Based on information and belief formed after reasonable inquiry, I certify that the statements and information in the enclosed documents are to the best of my knowledge and belief true, accurate and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment."

All reports submitted to DES (except those submitted as emission based fees as outlined in Section

XXIII of this Permit) shall be submitted to the following address:

New Hampshire Department of Environmental Services
Air Resources Division
6 Hazen Drive
P.O. Box 95
Concord, NH 03302-0095
ATTN: Section Supervisor, Compliance Bureau

All reports submitted to EPA shall be submitted to the following address:

Office of Environmental Stewardship
Director Air Compliance Program
United States Environmental Protection Agency
1 Congress Street
Suite 1100 (SEA)
Boston, MA 02114-2023
ATTN: Air Compliance Clerk

XXII. Enforcement

Any noncompliance with a permit condition constitutes a violation of RSA 125-C:15, and, as to the conditions in this permit which are federally enforceable, a violation of the Clean Air Act, 42 U.S.C. Section 7401 et seq., and is grounds for enforcement action, for permit termination or revocation, or for denial of an operating permit renewal application by the DES and/or EPA. Noncompliance may also be grounds for assessment of administrative, civil or criminal penalties in accordance with RSA 125-C:15 and/or the Clean Air Act. This Permit does not relieve the Permittee from the obligation to comply with any other provisions of RSA 125-C, the New Hampshire Rules Governing the Control of Air Pollution, or the Clean Air Act, or to obtain any other necessary authorizations from other governmental agencies, or to comply with all other applicable Federal, State, or Local rules and regulations, not addressed in this Permit.

In accordance with 40 CFR 70.6 (a)(6)(ii) a Permittee shall not claim as a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Permit.

XXIII. Emission-Based Fee Requirements

A. The Permittee shall pay an emission-based fee annually for this facility as calculated each calendar year pursuant to Env-A 704.03.

B. The Permittee shall determine the total actual annual emissions from the facility to be included in the emission-based multiplier specified in Env-A 704.03(a) for each calendar year in accordance with the methods specified in Env-A 620.

C. The Permittee shall calculate the annual emission-based fee for each calendar year in accordance

$$FEE = E * DPT * CPIm * ISF$$

with the procedures specified in Env-A 704.03 and the following equation:

Where:

FEE =	The annual emission-based fee for each calendar year as specified in Env-A 704.
E =	The emission-based multiplier is based on the calculation of total annual emissions as specified in Env-A 704.02 and the provisions specified in Env-A 704.03(a).
DPT =	The dollar per ton fee the DES has specified in Env-A 704.03(b).
CPIm=	The Consumer Price Index Multiplier as calculated in Env-A 704.03(c).
ISF =	The Inventory Stabilization Factor as specified in Env-A 704.03(d).

D. The Permittee shall contact the DES each calendar year for the value of the Inventory Stabilization Factor.

E. The Permittee shall contact the DES each calendar year for the value of the Consumer Price Index Multiplier.

F. The Permittee shall submit, to the DES, payment of the emission-based fee and a summary of the calculations for each calendar year by October 15th of the following calendar year in accordance with Env-A 704.04. The emission-based fee and summary of the calculations shall be submitted to the following address:

New Hampshire Department of Environmental Services
Air Resources Division
6 Hazen Drive
P.O. Box 95
Concord, NH 03302-0095
ATTN.: Emissions Inventory

G. The DES shall notify the Permittee of any under payments or over payments of the annual emission-based fee in accordance with Env-A 704.05.

XXIV. Duty To Provide Information

In accordance with 40 CFR 70.6 (a)(6)(v), upon the DES's written request, the Permittee shall furnish, within a reasonable time, any information necessary for determining whether cause exists for modifying, revoking and reissuing, or terminating the Permit, or to determine compliance with the Permit. Upon request, the Permittee shall furnish to the DES copies of records that the Permittee is required to retain by this Permit. The Permittee may make a claim of confidentiality as to any information submitted pursuant to this condition in accordance with Part Env-A 103 at the time such information is submitted to DES. DES shall evaluate such requests in accordance with the provisions of Part Env-A 103.

XXV. Property Rights

Pursuant to 40 CFR 70.6 (a)(6)(iv), this Permit does not convey any property rights of any sort, or any exclusive privilege.

XXVI. Severability Clause

Pursuant to 40 CFR 70.6 (a)(5), the provisions of this Permit are severable, and if any provision of this Permit, or the application of any provision of this Permit to any circumstances is held invalid, the application of such provision to other circumstances, and the remainder of this Permit, shall not be

affected thereby.

XXVII. Emergency Conditions

Pursuant to 40 CFR 70.6 (g), the Permittee shall be shielded from enforcement action brought for noncompliance with technology based[8] emission limitations specified in this Permit as a result of an emergency[9]. In order to use emergency as an affirmative defense to an action brought for noncompliance, the Permittee shall demonstrate the affirmative defense through properly signed, contemporaneous operating logs, or other relevant evidence that:

1. An emergency occurred and that the Permittee can identify the cause(s) of the emergency;

2. The permitted facility was at the time being properly operated;

3. During the period of the emergency, the Permittee took all reasonable steps as expeditiously as possible, to minimize levels of emissions that exceeded the emissions standards, or other requirements in this Permit; and

4. The Permittee submitted notice of the emergency to the DES within two (2) business days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emission, and corrective actions taken.

XXVIII. Permit Deviation

In accordance with 40 CFR 70.6(a)(3)(iii)(B), the Permittee shall report to the DES all instances of deviations from Permit requirements, by telephone, fax, or e-mail (pdeviations@des.state.nh.us) within 24 hours of discovery of such deviation. This report shall include the deviation itself, including those attributable to upset conditions as defined in this Permit, the probable cause of such deviations, and any corrective actions or preventative measures taken. Within 15 days of discovery of the permit deviation, the Permittee shall submit a written report including the above information as well as the following: preventive measures taken to prevent future occurrences; date and time the permitted device returned to normal operation; specific device, process or air pollution control equipment that contributed to the permit deviation; type and quantity of excess emissions emitted to the atmosphere due to permit deviation; and an explanation of the calculation or estimation used to quantify excess emissions. Said Permit deviation shall also be submitted in writing to the DES in the semi-annual summary report of monitoring and testing requirements due July 31st and January 31st of each calendar year. Deviations are instances where any Permit condition is violated and has not already been reported as an emergency pursuant to Section XXVII of this Permit.

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[8] Technology based emission limits are those established on the basis of emission reductions achievable with various control measures or process changes (e.g., a new source performance standard) rather than those established to attain health based air quality standards.

[9] An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation would require immediate corrective action to restore normal operation, and that causes the source to exceed a technology based limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operations, operator error or decision to keep operating despite knowledge of any of these things.

Reporting a Permit deviation is not an affirmative defense for action brought for noncompliance.

Appendix A

(List of Insignificant Activities)

Appendix A - List of Insignificant or Minor Core-related Activities		
Insignificant Activity Number	Description of Insignificant or Minor Core-related Activity	Emissions Unit Maximum Design Capacity or Emission Rate
IA1	Area Space Heater (LPG)	3.337 mmBtu/hr
IA2	Area Space Heater (LPG)	2.332 mmBtu/hr
IA3	Area Space Heater (LPG)	2.475 mmBtu/hr
IA4	Area Space Heater (LPG)	0.500 mmBtu/hr
IA5	Customer Sample Preparation	Accounted for in KWS, KCRF, and IBSS processes
IA6	Dravo/Hastings Furnace (No. 2 fuel oil)	1.562 mmBtu/hr
IA7	HB Smith Boiler (No. 4 fuel oil)	3.9 mmBtu/hr
IA8	Jackson Church Furnace (No. 2 fuel oil)	0.937 mmBtu/hr
IA9	Jackson Church Furnace (Natural gas)	0.625 mmBtu/hr
IA10	Process Burner (LPG)	0.500 mmBtu/hr
IA11	Process Burner (LPG)	0.500 mmBtu/hr
IA12	Process Burner (LPG)	0.500 mmBtu/hr
IA13	Process Burner (LPG)	0.200 mmBtu/hr
IA14	Solvent Reclamation Devices	Accounted for in KWS, KCRF, and Ancillary processes
IA15	Utica Process Boiler (LPG)	0.15 mmBtu/hr
IA16	Weather Sealant prepared and shipped off-site	*
IA17	Aluminum Prep Wash Tank	250 pounds
IA18	Production welding	300 pounds
IA19	Ink for labeling aluminum extrusions	100 pounds
IA20	Laboratory Exhaust Hood	Accounted for in KWS, KCRF, IBSS, and Ancillary Processes
IA21	Temperature Indicating Liquid	50 pounds
IA22	Transferring of coatings, etc. in chemical storage area	*
IA23	Process Burner (LPG)	0.25 mmBtu/hr
IA24	Process Burner (LPG)	0.25 mmBtu/hr

* = This is a transfer process and assumes negligible emissions during transfer.